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6 **UNITED STATES DISTRICT COURT**  
7 **WESTERN DISTRICT OF WASHINGTON**  
8 **AT SEATTLE**

9 AVELARDO RIVERA and YASMINE  
10 ROMERO, individually and on behalf of all  
others similarly situated,

11 *Plaintiffs,*

12 v.

13 AMAZON WEB SERVICES, INC., a  
14 Delaware corporation,

15 *Defendant.*  
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Case No. 2:22-cv-00269-JHC

**STIPULATION AND ORDER SETTING  
BRIEFING DEADLINES FOR  
PLAINTIFFS' MOTION TO EXTEND  
THIRD-PARTY FACT DISCOVERY  
DEADLINE AND RELATED MOTION TO  
SEAL**

1 Plaintiffs Avelardo Rivera and Yasmine Romero (“Plaintiffs”) and Defendant Amazon  
2 Web Services (“AWS” or “Defendant”) (collectively, “the Parties”), by their counsel, jointly  
3 stipulate and agree to a revised briefing schedule for Plaintiff’s Motion to Extend Third-Party  
4 Fact Discovery Deadline and a related Motion to Seal. In support of this stipulation, the Parties  
5 state as follows:

6 1. On October 14, 2024, Plaintiffs filed a Motion to Extend the Third-Party Fact  
7 Discovery Deadline, seeking to extend the deadline for fact discovery from third parties by sixty  
8 days, to December 13, 2024. (*See* dkt. 207.) Plaintiffs simultaneously moved for leave to file  
9 documents and deposition testimony under seal in support of their motion, given that Defendant  
10 and non-party ProctorU, Inc. have designated these materials as confidential or highly  
11 confidential under the Protective Order. (*See* dkt. 209.)

12 2. On October 16, one of Plaintiffs’ attorneys, Schuyler Ufkes, was impaneled as a  
13 juror in the federal court for the Northern District of Illinois, in a trial scheduled to last for three  
14 weeks. Mr. Ufkes will be unavailable during working hours for the duration of his jury service.

15 3. LCR 7(d)(2) provides that upon a motion for relief from a deadline, any  
16 opposition papers shall be filed no later than 9 days after the filing date of the motion, and any  
17 reply papers shall be filed and received by the opposing party no later than 14 days after the  
18 filing date of the motion. Mr. Ufkes’ unanticipated obligations as a juror will make it difficult for  
19 Plaintiffs to adequately brief Plaintiffs’ motion on the schedule provided by LCR 7(d)(2).

20 4. Accordingly, the Parties hereby stipulate and agree, subject to Court approval, to  
21 alter the briefing schedule such that (1) Defendant’s opposition papers to Plaintiffs’ Motion to  
22 Extend Fact Discovery Deadline shall be filed no later than November 1, 2024, (2) Defendant’s  
23 and non-party ProctorU, Inc.’s responses to the Motion to Seal also shall be filed no later than  
24 November 1, 2024, and (3) Plaintiffs’ reply in support of the Motion to Extend Fact Discovery  
25 Deadline and related Motion to Seal shall be filed no later than November 8, 2024.

26 WHEREFORE, the Parties respectfully request that the Court approve the revised  
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1 briefing schedule as described above.

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3 Respectfully Submitted,

4 **AVELARDO RIVERA** and **YASMINE**  
5 **ROMERO**, individually and on behalf of all others  
similarly situated,

6 Dated: October 18, 2024

7 By: /s/ Schuyler Ufkes  
One of Plaintiffs' Attorneys

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**AMAZON WEB SERVICES, INC.,**

Dated: October 18, 2024

By: /s/ Ryan Spear  
One of Defendant's Attorneys

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Amazon Web Services Inc.*

**ORDER**

IT IS SO ORDERED. The Court DIRECTS the Clerk to re-note the motions at Dkt. ##  
207, 208, and 209 for November 8, 2024.

DATED this 18th day of October, 2024.



JOHN H. CHUN  
UNITED STATES DISTRICT JUDGE